

# Exhibit FF

DR. WILLIAM LONGO, on 04/21/2021  
CHRISTINA G. PRUDENCIO vs. JOHNSON & JOHNSON, et al.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

THE COUNTY OF ALAMEDA

CHRISTINA G. PRUDENCIO,

Plaintiff,

vs.

JOHNSON & JOHNSON; JOHNSON  
& JOHNSON CONSUMER, INC.

(Sued individually and as  
successor-in-interest to  
JOHNSON & JOHNSON CONSUMER  
COMPANIES, INC.), et al.,

Defendants.

)  
)  
)  
)  
) Case No.  
) RG20061303

**Certified Transcript**

) (Pages 1 - 228)

DEPOSITION OF EXPERT WITNESS

DR. WILLIAM LONGO

WEDNESDAY, APRIL 21, 2021

Reported by: KAREN C. WATERS, REGISTERED

PROFESSIONAL REPORTER

DR. WILLIAM LONGO, on 04/21/2021  
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1 SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR

2 THE COUNTY OF ALAMEDA

3 CHRISTINA G. PRUDENCIO, )

4 Plaintiff, )

5 vs. )

) Case No.

) RG20061303

6 JOHNSON & JOHNSON; JOHNSON )

7 & JOHNSON CONSUMER, INC. )

8 (Sued individually and as )

9 successor-in-interest to )

JOHNSON & JOHNSON CONSUMER )

COMPANIES, INC.), et al., )

10 Defendants. )

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21 DEPOSITION OF DR. WILLIAM LONGO, taken on

22 behalf of Defendants, remotely via

23 videoconference, commencing at 9:05 a.m. (PST),

24 Wednesday, April 21, 2021, before Karen C.

25 Waters, Registered Professional Reporter.

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1 APPEARANCES: (Via videoconference):

2  
3 For Plaintiff:

4 KAZAN, MCCLAIN, SATTERLEY & GREENWOOD  
5 BY: IAN A. RIVAMONTE, ESQ.  
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7 55 Harrison Street  
8 Suite 400  
9 Oakland, California 94607  
10 (510) 302-1000  
11 irivamonte@kazanlaw.com

12 For Defendants LONGS DRUG STORES CALIFORNIA,  
13 L.L.C., on behalf of LONGS DRUG STORES  
14 CALIFORNIA, INC. (Erroneously sued as LONGS DRUG  
15 STORES CALIFORNIA, L.L.C., individually and as  
16 successor-in-interest, parent, alter ego, and  
17 equitable trustee of LONGS DRUG STORES  
18 CALIFORNIA, INC.); SAFEWAY INC.; LUCKY STORES,  
19 INC.; and ALBERTSONS COMPANIES, INC.:

20 BARNES & THORNBURG LLP  
21 BY: MITCHELL R. CHARCHALIS, ESQ.  
22 2029 Century Park East  
23 Suite 300  
24 Los Angeles, California 90067  
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For Defendants JOHNSON & JOHNSON and JOHNSON &  
JOHNSON CONSUMER INC.:

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1 APPEARANCE (Via videoconference) (continued):

2  
3 For Defendant PERRIGO COMPANY OF TENNESSEE:

4 GOODELL, DEVRIES, LEECH & DANN, LLP  
5 BY: JEFFREY J. HINES, ESQ.  
6 One South Street  
7 20th Floor  
8 Baltimore, Maryland 21202  
9 (410) 783-4041  
10 jjh@gdldlaw.com

11  
12 For Defendant VI-HON, INC.:

13 REED SMITH LLP  
14 BY: SHANA E. RUSSO, ESQ.  
15 506 Carnegie Center  
16 Suite 300  
17 Princeton, New Jersey 08540-7839  
18 (609) 987-0050  
19 srusso@reedsmith.com

20  
21 Also Present:

22 Bret Hampton, the videographer.  
23  
24  
25

1 ISO PLM method. Sample preparation for the  
2 heavy liquid density is not the ISO method, but  
3 that's what I -- what we had been calling the  
4 CSM method.

5 Q. Okay.

6 A. So it's two different things. There's  
7 sample prep, but then there's the analysis to  
8 determine if chrysotile is present.

9 Q. Right. So that analysis follows the ISO  
10 22262-1 methodology?

11 A. Yes.

12 Q. And Paul Hess, he was the individual who  
13 performed all of the PLM analyses as part of  
14 this report that was marked as 3F as well as the  
15 part that was marked as 3G?

16 A. Yes.

17 Q. Okay. And I guess as part of this  
18 report, 3F, Mr. Hess identified what he  
19 identified as chrysotile at levels varying  
20 from -- without the liquid separation  
21 technique -- levels from .006 to .009 area  
22 percent weight, correct?

23 A. I believe that's correct. I know you're  
24 just reading it off the results, but I always  
25 feel silly if I agree and then it's not. That

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die.)

REPORTER'S CERTIFICATE

I, KAREN WATERS, Registered Professional Reporter, do hereby certify that previous to the commencement of the examination, the said DR. WILLIAM LONGO, was duly sworn by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my  
Signature this April 27, 2021.



Karen Waters

\_\_\_\_ Reading and Signing was requested.

  x   Reading and Signing was waived.

\_\_\_\_ Reading and Signing is not required.